

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

JANE DOE,

Plaintiff,

v.

**RECTOR AND VISITORS OF THE
UNIVERSITY OF VIRGINIA,**

Defendant.

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) **Case No. 3:23-cv-00018-RSB**
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DECLARATION

I, Barbara Zunder, pursuant to 28 U.S.C. § 1746, hereby declare and state as follows:

1. I am over the age of eighteen, and I am competent to testify to the matters described in this Declaration. Unless otherwise indicated, I have personal knowledge of the facts and statements in this Declaration and am prepared to testify to them, among other things, at a hearing or trial related to this matter or the issues or facts discussed in this Declaration.

2. I am the Director of the Student Disability Access Center at the University of Virginia (“UVA”), and have held this position since January 2016. I joined Student Health & Wellness at UVA, of which the Student Disability Access Center is a part, in January 2016.

3. In my position, I have access to the records of the Student Disability Access Center for past and current UVA students.

4. In relation to the above-described lawsuit, on July 11, 2024, I prepared a report for the Plaintiff Jane Doe that sets out her appointments, student profiles, accommodation requests, and alternative testing with the Student Disability Access Center. This report drew from information maintained by the Student Disability Access Center.

5. I have reviewed the ten-page Student Disability Access Center Report for Jane Doe that the Defendant has marked as Bates number UVA005996-6005.

6. To the best of my knowledge and belief, the Student Disability Access Center Report for Jane Doe that the Defendant has marked as Bates number UVA005996-6005 is a true and accurate copy of the report that I prepared for Jane Doe on July 11, 2024.

7. The information in the Student Disability Access Center Report for Jane Doe that the Defendant has marked as Bates number UVA005996-6005 was kept in the course of a regularly conducted activity of UVA's Student Disability Access Center.

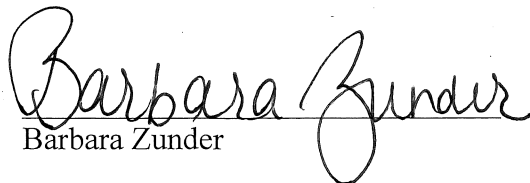
8. Recording the information in the Student Disability Access Center Report for Jane Doe that the Defendant has marked as Bates number UVA005996-6005 was a regular practice of UVA's Student Disability Access Center.

9. The Student Disability Access Center Report for Jane Doe shows that Jane Doe met with Jennifer Uber on March 18, 2020 to discuss Jane Doe's application for accommodations for her classes during the Spring 2020 semester. Jennifer Uber was an Accessibility Specialist with the Student Disability Access Center. I was Ms. Uber's supervisor. Ms. Uber is no longer with UVA.

10. On March 18, 2020, the Student Disability Access Center notified, by email, Plaintiff Jane Doe's professors for her Spring 2020 classes that she was granted the accommodations described in the Student Disability Access Center Report for Jane Doe that the Defendant has marked as Bates number UVA005996-6005.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on 09 / 13 /2024.


Barbara Zunder